

AMENDED Exhibit 731

PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

A/C Privileged and Confidential

ATTORNEY CLIENT PRIVILEGED - **work in process**

Commented [1]: A/C Privileged and Confidential

Please review and advise

Assigned to

Note: This is a BRAINSTORMING doc only, to capture thinking. Draft 2-pager will be shared for review separately. [HYPERLINK

"https://docs.google.com/ [REDACTED] \h]

Key Questions:

- Given that YT is the top viewing platform for younger audiences globally, why are we losing them before they become teens?
- How might we deliver value to our younger users as they grow older, to help create the next generation of Teens on YouTube?
- How might we unify our YT experiences across co-watching and supervised experiences (YTK, SupeX-Tween, future SupeX-Teen) to create a simpler u18 journey from young child to teen?

Commented [2]: Ask from [REDACTED] Add a funnel chart for primary path on user behavioral data to show where we are losing users

Problem Statement and Background

- WHY NOW: YT is focused on responsibly growing engagement with teens, especially given increased competition for teen attention – teens are using YT less and spending less of their time on YT. For more on our thinking in this area, read [HYPERLINK [REDACTED]].
- YT does have an advantage over other platforms, in that we have [HYPERLINK "https://www.businessinsider.com/gen-alpha-loves-mcdonalds-youtube-telling-parents-what-to-buy-2023-3" \h]. [HYPERLINK [REDACTED]], and there is a [HYPERLINK "https://www.wired.com/story/future-of-childrens-television-youtube-roblox/" \h] available on the platform. Additionally, over the years, we have invested in creating bespoke experiences for them (YT Kids, MFK VOD/Shorts islands, SupeX).
- However, there is increasing evidence that users [HYPERLINK "https://kidscreen.com/2022/09/12/kids-shifting-from-youtube-to-tiktok-at-age-10/" \h] (and possibly [HYPERLINK "https://kidscreen.com/2023/03/14/tiktok-use-is-aging-down-with-uk-kids/" \h]) are [HYPERLINK [REDACTED]] ([HYPERLINK [REDACTED]]). In other words, the "flight from YT" seems to be happening at earlier and earlier ages, which presents an existential threat (as GenAlpha is the next generation of Teens).
- Why are we experiencing challenges with this segment, given our relatively high levels of investment? To better understand this, it's helpful to break out our current offerings by age group (4 & under, 5-8, 9-12):

Commented [3]: To help hit this point home, Dubit runs surveys with thousands of families in 13 countries and found that YouTube reaches the highest number of kids around the world each week

Preschool: 4 & Under

Surface	Observations
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YTK mobile apps & web	+ Good appeal/retention for this age group - Separate app/destination prevents wider awareness/adoption - Lengthy onboarding flow with disclosures, gates, reauth screen creates friction to get started: [REDACTED] % completion rate for sign-in flow, [REDACTED] % for signed-out flow ([HYPERLINK [REDACTED]]
Crayola (access YTK directly from YT LR)	+ Good appeal/retention for this age group + Entrypoint in YT LR increases discovery and usage: [REDACTED] signed-in Crayola WAVs, vs [REDACTED] signed-in YTK LR WAVs - However, secondary device sign-in flow creates friction - and Crayola optimizes for signed-in usage currently: [REDACTED] signed-out Crayola WAVs, vs [REDACTED] signed-out YTK LR WAVs
MFK islands (VOD, Shorts)	+ No friction to start watching MFK on Main – [REDACTED] % of MFK is watched in Main + MFK Shorts corpus is [HYPERLINK "https://docs.google.com/[REDACTED] \h] + We have effective levers to move users to supervised experiences (See [HYPERLINK "https://docs.google.com/[REDACTED] \h]) - [HYPERLINK "https://docs.google.com/[REDACTED] \h] kid-friendly VODs compared to SFV - The MFK island has shrunk from [HYPERLINK "https://docs.google.com/[REDACTED] \h] as users are not engaging in WatchNext and navigating to less protected surfaces

Commented [4]: @ [REDACTED] let's cite stats on FT island shrinking. Assigned to [REDACTED]

Commented [5]: Sorry, missed this and just saw this doc today. I added a bullet.

Early Elementary: 5-8

Surface	Observations
YTK mobile apps & web, Crayola	+ [HYPERLINK "https://docs.google.com/[REDACTED] \h] - [HYPERLINK "https://docs.google.com/[REDACTED] \h] - [HYPERLINK [REDACTED]]

	"https://docs.google.com/ [REDACTED] \h]
MFK islands (VOD, Shorts)	+ TBD - [HYPERLINK "https://docs.google.com/ [REDACTED] \h] viewers - [HYPERLINK "https://docs.google.com/ [REDACTED] \h] are missing from the MFK Shorts corpus - [HYPERLINK "https://docs.google.com/ [REDACTED] \h] are under represented in the [HYPERLINK "https://docs.google.com/ [REDACTED] \h] - [REDACTED] of YT impressions [REDACTED] % of vod vs. [REDACTED] % of shorts) have kids appeal but are non-mfk - [REDACTED] % of non-mfk impressions with kids appeal are shorts (vs [REDACTED] % of all YT impressions are shorts). - The MFK island has shrunk from [HYPERLINK "https://docs.google.com/ [REDACTED] \h] as users are not engaging in WatchNext and navigating to less protected surfaces

Commented [6]: @ [REDACTED] thoughts?
Assigned to [REDACTED]

Commented [7]: @ [REDACTED]
lets add insights from YPS work for product gap for younger.
I added a placeholder.
Assigned to [REDACTED]

Commented [8]: Added Shorts/VOD breakdown

Tweens: 9-12

Surface	Observations
YTK mobile apps & web, Crayola	- While we offer a 9-12 corpus in YTK as a safer option, the delta from the 5-8 corpus is quite small, so it's not appealing for the vast majority of Tweens.
SupeX experience in YT Main & LR	+ SupeX has the content missing from YTK (SupeX/Explore is [REDACTED]x the YTK/Tween corpus), and would satisfy this age group - However, [HYPERLINK "https://docs.google.com/ [REDACTED] \h] - SupeX requires a parent to create a Unicorn account, which means it's effectively an Android solution and comes with extremely high friction to adopt (30-40 screen setup flow). UXR suggests busy parents prefer easier options like Restricted Mode to provide a 'gated' experience.
MFK islands (VOD, Shorts)	- (Same as 5-8)

- By this age range, users have largely aged out of MFK content (which tends to be preschoolish/juvenile animation).

Summary of Key Challenges:

1. **Our supervised experiences have too much friction to get meaningful adoption.** For younger kids who do use YTK, we don't have all of the content they want to watch as they get into the 5-8 age range.
 - o YTK as a separate app has lower awareness / willingness to engage, and its lengthy onboarding flow loses many potential users
 - o SupeX relies on Unicorn account creation, which (a) makes it effectively a solution for Android users and (b) heavily throttles the # of users who will go through the effort
2. **For parents who allow their kids to co-watch on their accounts, we can't provide an appealing recs experience over the long term** – due to shared account recs pollution, and ultimately not knowing who the user is and how old they are.
3. **There is no path today for kids to participate / create on YT**, which is a [[HYPERLINK "https://earthweb.com/why-children-want-to-be-youtubers-when-they-grow-up/"](https://earthweb.com/why-children-want-to-be-youtubers-when-they-grow-up/)].
 - o Users are trying to satisfy this demand elsewhere – for example, TT removed [[HYPERLINK "https://techcrunch.com/2023/09/15/tiktok-gdpr-childrens-data-decision/"](https://techcrunch.com/2023/09/15/tiktok-gdpr-childrens-data-decision/)]. Similarly, when we see accounts uploading videos where we identify the user is underage, we terminate the account.

STOP HERE

Proposed Solutions

Note, these options assume the "YouTube Kids" brand can't be retired - we've made many external representations of YTK being the safer, recommended alternative for parents of younger kids, and having a YTK surface derisks overall YT.

Consideration Set for evaluating options:

- Addresses user needs (ease of use, desired functionality, desired content)
- Potential impact/reach
- Legal/Policy risk

Options:

Commented [9]: [REDACTED], we are wondering if you have any research on why kids/parents on Main YT are leaving before teen years? eg if research tells us families with tweens are watching regular shorts, why do we lose them?

Assigned to [REDACTED]

Commented [10]: From our KidSay Trend Tracker synthesis report, we can definitely start to see the shift away from YouTube to TT around the tween years. Survey insights found that TT is their go to source for funny/silly videos whereas YT is for interesting videos. Also we know from academic research the importance of peer groups at this age. Although YT shorts is great for consuming lots of content as a kid/tween, as they become teenagers their need to connect with each other online because greater. Apps like IG and TT allow them to directly interact with their peers through creation, DMs, reactions, stories, etc.

Commented [11]: If we say the solutions are providing better user experience and recommendations, I think we should expect positive movement to top YT metrics? E.g. mitigation account pollution should improve engagement metrics for certain user slice (e.g. millennial women). Making YT more appealing for family co-watching and to tweens should have positive impact on YT DAU / YTT.

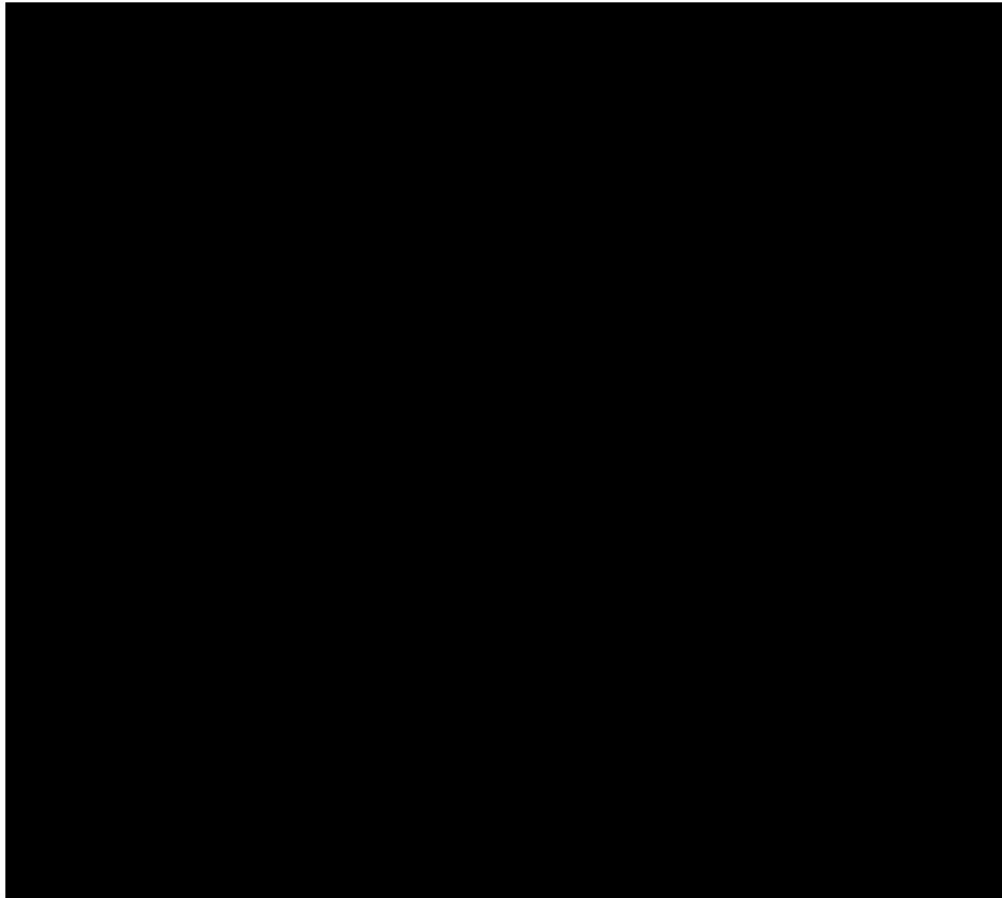
If we only added a config option for user, but see no metric improvement, can we claim it is a success?

[REDACTED]

Commented [12]: Could you please elaborate a bit more on this idea?

[REDACTED]

Commented [13]: [REDACTED] [REDACTED] [REDACTED]



Commented [14]: 1 total reaction
[REDACTED] reacted with + at 2023-10-25 10:55 AM

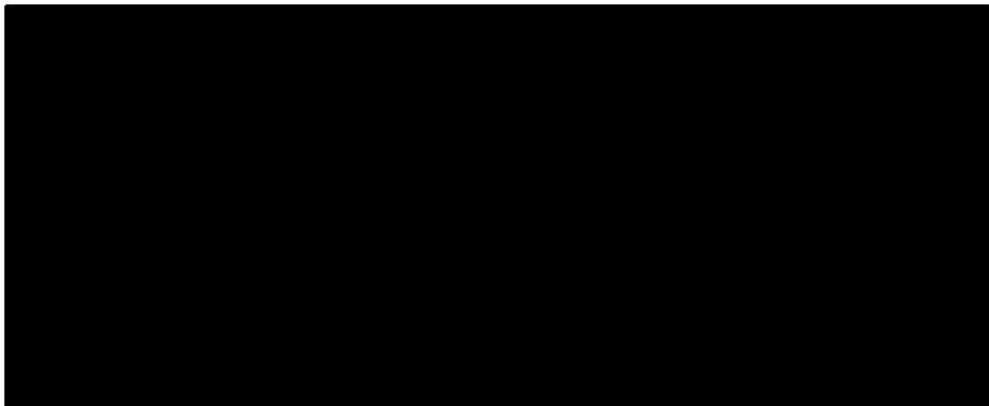
Commented [15]: Do we have numbers about what % of users turn on restricted mode? I found this dashboard, but it shows errors.
[REDACTED]

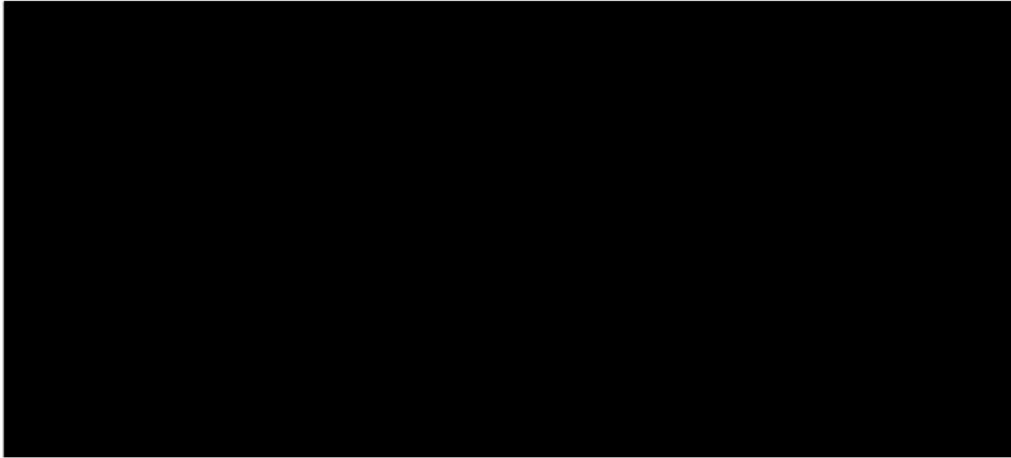
Commented [16]: This seems orthogonal to the other options. Right now, since it is under the "Options" section, it feels like we need to tradeoff with one of the other options.

Commented [17]: +1, this one seems not coupled / conflicting with any of the 3 options above.

Summary of Options

Commented [18]: What Yellow vs Pink? I believe Pink is more negative than Yellow?





Commented [19]: [REDACTED]

(Recommendation?)

///

Family co-creation

- [HYPERLINK "https://www.tiktok.com/discover/kids-dance-challenge" \h] vs. [HYPERLINK [REDACTED] " \h]

2024 Success Metrics

- How will we know we succeeded in 2024?
- What will we look at in 2024 to know whether our hypothesis/idea/strategy is succeeding?
- What 2-3 success metrics can we measure?

Discussion Questions

- How will you start the discussion?
- List of ~3 questions that need xfn alignment and that you'd really like the group's input on
- Where do we want to make our biggest bets in 2024?
- What are we optimizing for - reach

-----OLD BRAINSTORMING BELOW THIS LINE-----

- Explain some of the solutions available to you and the pros and cons.
- What does landing look like and what's your best guess of how long it'll take to get there?
 - Be specific about the time horizon you are proposing
 - What does maintenance mode look like?
- End this section with a recommendation
 - It is less important that your recommendation is right and more important that you outline the options and advocate for one approach - this leads to a good discussion, which is our primary goal! Try to be specific and give examples to illustrate your approach.
 - Consider including a table or a diagram or mocks here to help make the proposed solution real to the readers. (If you include pictures/mocks you get some leeway on the length of the document.)

NOTES

Kids to Teens Graduation (summary for Teen 2024 2 pager appendix)

Data to gather:

- What percentage of Teen DAU or MAU watch both vod and shorts.
- What percentage of Teen DAU or MAU create shorts (on YT vs. TikTok)
- What percentage of Teen DAU or MAU participate in comments (write, like, reply etc) (on YT vs. TikTok)
- Stats to show what's the importance/value of teen to YT top metrics, for teens that use
 - Primarily YT VoDs as viewers
 - YT VoDs and YT Shorts as viewers
 - Primarily YT Shorts as viewers
 - YT for creating Shorts, participating via comments, likes etc
- Stats to show long-term value of YTK, SupeX experiences to YT Growth metrics (e.g. DAU, MAU, YTT, WT)
- Stats to show long-term value of co-watching families on Main to YT Growth metrics beyond MFK

Questions to discuss

- Which users should be the primary audience to win asap?
 - Current teens who are not using YT beyond vod watching?
 - New teens that are joining YT, to use YT beyond vods?
 - Current Tweens & families?
- Should YT reopen the discussions on being a mixed audience app?
- Would continuing to improve YTK (as a separate App) and SupeX (with Unicorn accounts), while necessary, would it ever be sufficient to meet the needs of busy families doing things together and on the go?

Commented [20]:

Hey

Do we have any stats to show what's the 'value to YT' of teens using shorts - viewing, creation, participation - comments, likes etc..

e.g. for teens who use YT for both vod and shorts vs. Teens who only use YT for primarily vod -- what does DAU / MAU, YTT looks like?

_Assigned to

Commented [21]: There's selection bias - heavier users are more likely to use shorts. So I have no doubt that those that use vod + shorts will have higher YTT, more frequent users etc.

I doubt that's a huge new insight or particularly actionable. We had looked at this in a different context:

Commented [22]: @

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_Assigned to

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I doubt that's a huge new insight or particularly actionable. We had looked at this in a different context:

Commented [24]: The precipitous drop in FT WT might mean users will navigate away from YT and so will the creators. If we lose the MFK flywheel, we could be an easy target if say TikTok decided to invest in the area... Is there an urgency around regaining MFK engagement?

- In a time and resource constrained environment, how should we prioritize between the three options first?
-

Options

Caveat1: not mutually exclusive, but framed to force a prioritization discussion on where to start first

Caveat2: options below do not include how to “win back” teens that have already moved on to other products, e.g. tiktok, reels, for SVF, creation usecases

Commented [25]: FT WT as a fraction of YTT dropped █% in the last three years. I wonder if caters well is accurate?

Commented [26]: The way this is framed makes it sound like they must be mutually exclusive – not sure that is the right way to think about this.

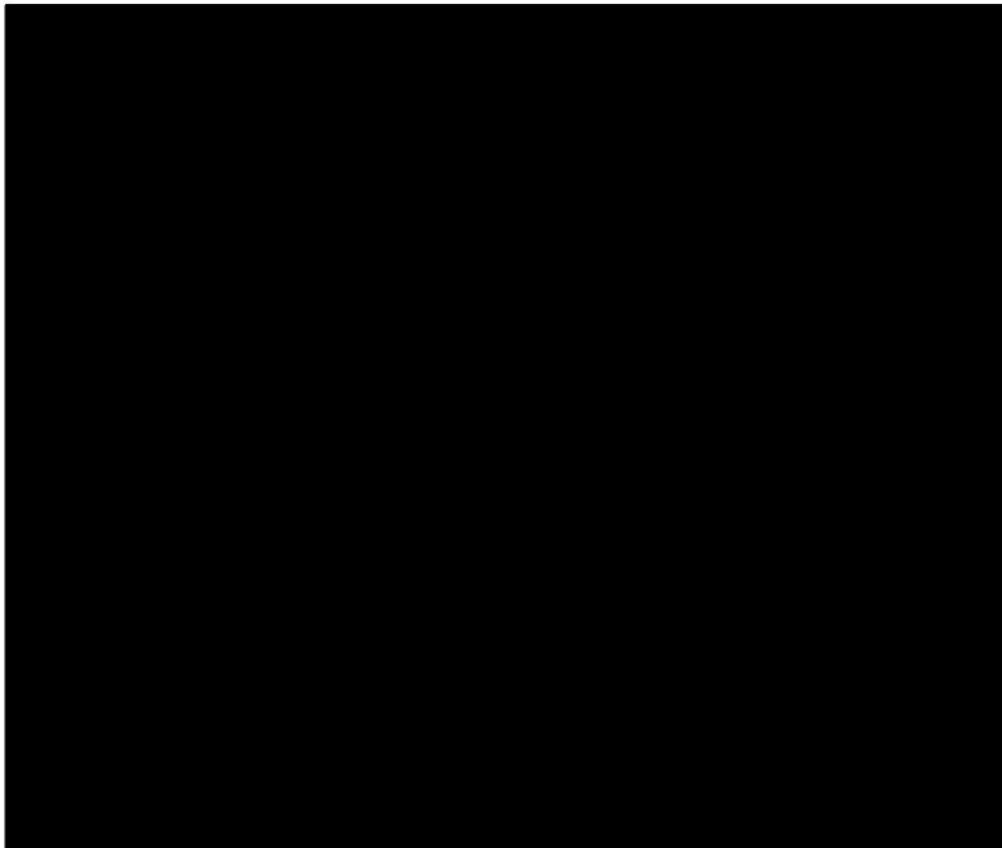
I took an alternate approach below, outlining the various challenges of our different types of experiences, leading to multiple potential projects and optionality for how we can address the key question - leveraging our strength with younger. PTAL and we can discuss tmrw

Commented [27]: agree these options are not mutually exclusive, but I'm deliberately framing them in such a way to force a prioritization discussion :)

Commented [28]: █

Commented [29]: The way this is framed makes it sound like they must be mutually exclusive – not sure that is the right way to think about this.

I took an alternate approach below, outlining the various challenges of our different types of experiences, leading to multiple potential projects and optionality for how we can address the key question - leveraging our strength with younger. PTAL and we can discuss tmrw



Commented [30]: agree these options are not mutually exclusive, but I'm deliberately framing them in such a way to force a prioritization discussion :)

Commented [31]: [REDACTED]

Commented [32]: [REDACTED]

Commented [33]: The way this is framed makes it sound like they must be mutually exclusive -- not sure that is the right way to think about this.

I took an alternate approach below, outlining the various challenges of our different types of experiences, leading to multiple potential projects and optionality for how we can address the key question - leveraging our strength with younger. PTAL and we can discuss tmrw

Commented [34]: agree these options are not mutually exclusive, but I'm deliberately framing them in such a way to force a prioritization discussion :)

Commented [35]: [REDACTED]

WIP draft

- YT has a competitive advantage over other platforms, in that we have invested in creating experiences for younger users (YTK, MFK on Main, and SupeX). This is reflected in [HYPERLINK "<https://www.businessinsider.com/gen-alpha-loves-mcdonalds-youtube-telling-parents-what-to-buy-2023-3>" \h].
- However, more recently, there is evidence that users [HYPERLINK "[https://kidscreen.com/2022/09/12/kids-shifting-from-youtube-to-tiktok-at-age-10/](\"https://kidscreen.com/2022/09/12/kids-shifting-from-youtube-to-tiktok-at-age-10/\")" \h] (and possibly [HYPERLINK "[https://kidscreen.com/2023/03/14/tiktok-use-is-aging-down-with-uk-kids/](\"https://kidscreen.com/2023/03/14/tiktok-use-is-aging-down-with-uk-kids/\")" \h]) are moving to other platforms
- **Key question: How can we leverage our strength with younger audiences, find ways to better engage with them as they grow older, and have them emerge as the next generation of Teens on YouTube?**
- We have two categories of experiences today, each with large opportunities to responsibly grow:

- **Parent Supervised:** YTK and SupeX. While these have seen a decent level of adoption (██████ MAUs), the inherent friction to adopt these solutions (separate YTK app, Unicorn account for SupeX, parent onboarding for both) constrains broader usage – and we don't effectively graduate users through age-appropriate experiences as they get older. Instead, they stop using supervised experiences or YT altogether.
- **Watch Together:** MFK on Main (largely VOD, with MFK Shorts in the early stages of rolling out). ██████% of MFK content is watched in YT Main; this content largely appeals to very young kids (preschool age). As kids reach early-elementary age (5-8), MFK content is less appealing.
- This leads to a menu of projects we could potentially begin executing in 2024:

Commented [36]:

(██████'s original bullets)

While there is evidence that Kids as young as 10 are using Tiktok [cite], YT is still quite popular with u13 users, especially u8 users [cite]. YT also has played a leadership role in building responsible products for u13 users: Kids app [XX WAVs], SupeX [XX DAUs with YY YoY growth], Shorts MFK [XX DAUs with YY Growth]. We could increase our investment to build fun and responsible products for u13 users:

- Increase SupeX adoption with more features: Launch creation and sharing in SupeX, grow SupeX adoption on iOS (80% [cite] of SupeX users today on Android), etc.
 - Currently, most SupeX users do not graduate to new accounts. Enabling creation can encourage them to do that more.
- Revamp restricted mode as a family co-watching mode??
- Improve recommendation quality for Kids: Invest in 5-8 year old user segment to provide better recommendation quality

What should YT be

- #1 in WT
- Creation
- Day time audience vs. night time audience

Tiktok as shorts platform – won't beat night time audience.. What's the probability

- Do teens outgrow tiktok?
- Will users stick around with tiktok for longer videos..

Longitudinal analysis

- Cookie over 7 years, likelihood you were a core genz user and were a causal vs. core teen users..
- Probability of core genz user – given your teen state
- Teen state
 - WT - casual, core
 - Activity - viewer, participant (comment, like, share), creator

Group	Category	Product offering	Observations/Research Insights
er	Supervised	YTK separate mobile / web apps	+ Good appeal/retention for this age group + Decent adoption ([REDACTED] MAVs) but could be much higher - Separate app/destination prevents wider awareness/adoption - Lengthy onboarding flow with lots of parental decision points
		Crayola - YTK entrypoint in YT Living Room	+ Good appeal/retention for this age group + Entrypoint in YT LR greatly simplifies decision-point for adoption - Lengthy onboarding flow (sign-in requires secondary device) creates friction
	Watch Together	MFK island VOD MFK island Shorts	+ MFK Shorts corpus is [HYPERLINK "https://docs.google.com/[REDACTED]] + We have effective levers to move users to supervised experiences (See [HYPERLINK "https://docs.google.com/[REDACTED]]) - [HYPERLINK "https://docs.google.com/[REDACTED]] kid-friendlyVODs compares to SFV - The MFK island has shrunk from [HYPERLINK "https://docs.google.com/[REDACTED]] as users are not engaging in WatchNext and navigating to less protected surfaces
			+ [HYPERLINK "https://docs.google.com/[REDACTED]] - [HYPERLINK "https://docs.google.com/[REDACTED]] - [HYPERLINK
	Supervised	YTK separate mobile / web apps	+ [HYPERLINK "https://docs.google.com/[REDACTED]] - [HYPERLINK "https://docs.google.com/[REDACTED]] - [HYPERLINK

Commented [37]: [REDACTED] let's cite stats on FT island shrinking
Assigned to [REDACTED]

Commented [38]: Sorry, missed this and just saw this doc today. I added a bullet.

Commented [39]: why don't we have LR/Crayola for 5-8 here?

Commented [40]: Good call out, I will add (reformatting the tables so this version moving out)

- + SupeX has content missing from YTK and this more appealing for this age group
- [HYPERLINK "https://docs.google.com/ [REDACTED] th]
- [HYPERLINK "https://docs.google.com/ [REDACTED]

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	Watch Together	MFK island VOD MFK island Shorts	+ TBD
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DOCUMENT SLIPSHEET

Bates Number: GOOG-3047MDL-02946487-GOOG-3047MDL-02946501

BEGATTACH: GOOG-3047MDL-02946487

ENDATTACH: GOOG-3047MDL-02946501

PRODVOL: PROD026

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Author: [REDACTED]

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